

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC,

Defendants.

No. 1:23-cv-08292-SHS

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LCC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

No. 1:23-cv-10211-SHS

**[PROPOSED] ORDER GRANTING OPENAI DEFENDANTS' MOTION TO SEAL
PLAINTIFFS' LETTER BRIEFS AND RELATED EXHIBITS**

Having considered the papers submitted and arguments presented in support of Defendants OpenAI, Inc.'s, OpenAI OpCo, LLC, OpenAI GP, LLC's, OpenAI LLC's, OpenAI Global LLC's, OAI Corporation LLC's, OpenAI Holdings, LLC's, OpenAI Startup Fund GP I, LLC's, OpenAI Startup Fund I, LP's, and OpenAI Startup Fund Management, LLC's (hereinafter "OpenAI") Motion to Seal Plaintiffs' Letter Briefs and Related Exhibits, and finding compelling reasons to be shown, the Court hereby orders the following to be filed under seal.

Document to be Sealed	Basis for Sealing Documents or Portions Thereof
Portions of Plaintiffs' letter brief relating to Data Working Group issues	The highlighted portions of the letter motions reference materials that have been designated as confidential or highly confidential pursuant to the protective order in this case (ECF No. 148). They contain commercially sensitive business information or communications.
Exhibit 2 to Plaintiffs' letter brief relating to Data Working Group issues	These exhibits have all been designated as confidential or highly confidential pursuant to the Protective Order in this case (ECF No. 148). They contain commercially sensitive business information or communications.
Portions of Plaintiffs' letter brief relating to OpenAI corporate structure	The highlighted portions of the letter motions reference materials that have been designated as confidential or highly confidential pursuant to the protective order in this case (ECF No. 148). They contain commercially sensitive business information or communications.
Exhibits E and F to Plaintiffs' letter brief relating to OpenAI corporate structure	These exhibits have all been designated as confidential or highly confidential pursuant to the Protective Order in this case (ECF No. 148). They contain commercially sensitive business information or communications.

IT IS SO ORDERED.

Dated: _____

Honorable Ona T. Wang
United States Magistrate Judge